sangamo

ALTERNATE LANGUAGE FOR FS

1. EPA Comment 50

Page 4-19, Second paragraph - Delete existing language and add the following:

The US EPA Guidance on Remedial Actions for Contaminated Groundwater of Superfund Sites, December 1988, discusses the difficulty associated with treatment in certain situations. These situations may include locations where fractured bedrock occurs, where soil permeabilities are low or where dense nonaqueous phase liquids (DNAPLs) are present.

Section 121(b)(1) of the Superfund Amendments and Reauthorization Act of 1986 states that "Remedial actions in which treatment which permanently and significantly reduces the volume, toxicity or mobility of the hazardous substances, pollutants, and contaminants is a principal element, are to be preferred over remedial actions not involving such treatment".

The remedial action objective of groundwater recovery at this site is to contain or control migration of an identified contaminant plume. Conditions at this site may increase the complexity of such a design. ~~The alternative of abandoning~~ the aquifer to the contamination would not be consistent with the SARA law.

2. EPA Comments 65, 90, and 91

Page 6-1, last sentence beginning "Each alternative was developed..." - Delete existing language to end of paragraph.

Page 6.7-1, Second paragraph from bottom, beginning "...Even though ground water..." - Delete existing language to end of discussion on page 6.7-4.

Page 6.7-4, Sangamo Plant Site, Replace the first paragraph with the following:

Ground water at the Sangamo Plant site occurs within the joint and fracture system of the bedrock. Ground water flow within the bedrock at the Sangamo Plant site is limited by the size, orientation, and interconnection of open joints and fractures and is not homogeneous. Wells installed to establish a hydraulic barrier would be based on a detailed design developed after further aquifer testing. Ground water discharge from wells surrounding the ridge would contain primarily VOCs. This water would be treated by air stripping. Ground water downgradient of areas A, B, E, and the wastewater treatment facility would be treated by carbon adsorption. In this area,

RI data showed PCBs in groundwater collected from 10 of 17 wells. VOCs have been detected in a majority of these wells. Treated water will be discharged into Town Creek.

Page 6.7-5, Breazeale Site - Remove "assumed" in first sentence. Rewrite last sentence to read as follows: "Treated water will be discharged into Wolf Creek."

Page 6.7-5, Dodgens Site - Remove "assumed" in first sentence. Rewrite last sentence to read as follows: "Treated water will be discharged into Middle Fork Twelvemile Creek."

Page 6.7-6, Effectiveness, 1st paragraph, 2nd sentence - Delete this sentence.

Page 6.7-7, Implementability, 1st paragraph, last sentence - Change "impossible" to "difficult".

Page 6.7-7, Section 6.7.3 - Add to the text at the beginning of paragraph two: "The goal of the groundwater collection system at these sites is to reduce the mobility of contaminated groundwater. This can be achieved by implementation of a groundwater collection remedial alternative.

Page 6.7-7, third paragraph - Delete the following sentence: "Fractures in bedrock that show no evidence of interconnection dramatically lower the probability of success for any groundwater collection system."

Page 6.7-7, third paragraph - Delete the last sentence.

Implementability

Page 6.11-4, Section 6.11.3, first paragraph, last sentence - Delete this sentence.

Page 6.12-3, Section 6.12.3, first paragraph, last sentence - Delete this sentence.

Page 6.14-14, Table 6-2, Alternative 6.7 - Delete second bullet. Delete sixth bullet. Delete last bullet.